



November 7, 2016

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: Notice of Ex Parte Communication, IB Docket No. 16-155

Dear Ms. Dortch:

On Thursday, November 3, 2016, Erin Dozier and Emmy Parsons of the National Association of Broadcasters (NAB) met with Troy Tanner, Denise Coca, David Krech, Veronica Garcia-Ulloa, Arthur Lechtman, Sumita Mukoty and Eric Orono of the FCC's International Bureau to discuss the Commission's proposal to improve the process for Executive Branch agency review of certain applications and petitions that may implicate national security, law enforcement, foreign policy and trade policy concerns due to existing or proposed foreign ownership interests.

At the meeting, NAB representatives expressed our support for the Commission's efforts to facilitate a more streamlined, timely and transparent review process while still fully taking account of Executive Branch agency concerns.¹ Consistent with comments NAB filed together with some of our member companies,² NAB urged the Commission to: (i) develop specific disclosure requirements as part of the instant rulemaking proceeding (rather than during the Paperwork Reduction Act process); (ii) modify the disclosure requirements to remove any that are irrelevant, inapplicable or duplicative in the broadcast context; and (iii) take steps to safeguard competitively sensitive information filed by Section 310(b) petitioners, to the extent that such material is filed with the Commission. We discussed NAB's view that several categories of information identified by the National Telecommunications and Information Administration (NTIA) do not relate to broadcasting. We reiterated that the core concerns underlying the information gathering proposed by NTIA—identifying and preventing espionage and the integrity of U.S. telecommunications

¹ *Process Reform for Executive Branch Review of Certain FCC Applications and Petitions Involving Foreign Ownership*, IB Docket No. 16-155, FCC No. 16-79, Notice of Proposed Rulemaking, at ¶ 1 (rel. June 24, 2016).

² Joint Comments of CBS Corporation, 21st Century Fox, Inc., Univision Communications Inc. and The National Association of Broadcasters, IB Docket No. 16-155 (Aug. 18, 2016) (Joint Broadcaster Comments).

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infrastructure—are not implicated by broadcast operations.³ We stated that the Commission's streamlining goals will be best effectuated by a process that does not require broadcasters to expend time and resources reviewing and seeking to answer non-pertinent questions.

Please direct any inquiries regarding this matter to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'ERL Dozier', with a stylized, cursive-like flow.

Erin L. Dozier
Senior Vice President and Deputy General Counsel
Legal & Regulatory Affairs

cc: Troy Tanner, Denise Coca, David Krech, Veronica Garcia-Ulloa, Arthur Lechtman,
Sumita Mukoty, Eric Orono

³ See Joint Broadcaster Comments at 2-5.